

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Petitions to Waive Payphone) CC Docket No. 96-128
Coding Digit Requirements)

COMMENTS OF U S WEST, INC.

U S WEST, Inc. ("U S WEST"), through counsel and pursuant to the Federal Communications Commission's ("Commission") Public Notice,¹ hereby files its comments on local exchange carrier ("LEC") petitions for waiver of the payphone coding digit requirements² and AT&T Corp.'s ("AT&T") response³ to the Commission's Waiver Order.⁴ U S WEST is a member of the LEC ANI Coalition and is a beneficiary of the Commission's Waiver Order. U S WEST is also a member of the LEC Payphone Coalition and concurs in the comments which the Coalition filed herein today. U S WEST is filing these supplementary comments because its circumstances differ somewhat from those of other members of the LEC

¹ Public Notice, Pleading Cycle Established for Petitions to Waive Payphone Coding Digits Requirements, CC Docket No. 96-128, DA 97-2214, rel. Oct. 20, 1997.

² Petition for Waiver of the United States Telephone Association ("USTA"), filed Sep. 30, 1997; TDS Communications Corporation Petition for Waiver, filed Oct. 1, 1997. And see, Letter to John B. Muleta, Common Carrier Bureau, from Michael K. Kellogg, LEC ANI Coalition, dated Sep. 30, 1997.

³ See Letter to John B. Muleta, Common Carrier Bureau, from E. E. Estey, AT&T, dated Oct. 14, 1997 ("Estey Letter").

⁴ In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-2162, rel. Oct. 7, 1997 ("Waiver Order").

Payphone Coalition.

U S WEST previously selected Originating Line Number Screening ("OLNS") to satisfy the anti-fraud requirements of CC Docket No. 91-35 rather than Flex Automatic Number Identification ("ANI"). The Commission's Order in CC Docket No. 91-35 allowed carriers the option of selecting OLNS or Flex ANI and indicated that either solution would be sufficient to identify payphones for per-call compensation purposes.⁵ U S WEST selected OLNS because it was the most economic means for a company such as U S WEST to satisfy the Commission's anti-fraud requirements.⁶ Until recently, U S WEST was of the opinion that OLNS was an acceptable means of identifying payphones for per-call compensation purposes.

The Commission's Waiver Order implies that OLNS may not be an acceptable means of satisfying the Commission's requirement to transmit specific ANI digits to identify calls from payphones for per-call compensation purposes. However, the Commission indicated that it will be investigating the payphone specific digit requirement further.⁷ As such, the Commission should take no action with respect to AT&T's request for a modification of the Waiver Order⁸ which might

⁵ In the Matter of Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation, Third Report and Order, 11 FCC Rcd. 17021 (1996).

⁶ U S WEST Communications, Tariff F.C.C. No. 5, Transmittal No. 858, filed Aug. 1, 1997, effective Sep. 15, 1997 ("OLNS Tariff").

⁷ Waiver Order ¶ 15.

⁸ AT&T states that without the transmission of specific payphone digits it cannot track toll free calls (i.e., 800 calls) for per-call compensation purposes. AT&T requests that the Waiver Order be modified to reflect this fact and that carriers be allowed to satisfy their compensation obligations by using the per-phone compensation method. See Estey Letter.

prejudice the outcome of the Commission's investigation into the transmission of payphone specific digits. If the Commission grants AT&T's request for modification (or waiver), it should clarify that any such modification or waiver in no way prejudices the issue of how the payphone identification requirement might be satisfied. In particular, the Commission should do nothing which would preclude LECs from using OLNS to satisfy this requirement.

Respectfully submitted,

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October 30, 1997

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 30th day of October, 1997,
I have caused a copy of the foregoing **COMMENTS OF U S WEST, INC.** to be
served, via first-class United States Mail, postage-prepaid, upon the persons listed
on the attached service list.


Kelseau Powe, Jr.

***Served via hand-delivery**

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